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*Attorney for Plaintiff, Edward Patrick Flaherty*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

EDWARD PATRICK FLAHERTY, an individual,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL  
ASSOCIATION dba WELLS FARGO BANK NA;  
and DOES 1-50, ROES 51-100.

Defendants.

CASE NO.: 3:22-cv-00025-MMD-CLB

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
PLAINTIFF AMENDED COMPLAINT**

**(Second Request)**

Plaintiff, Edward Patrick Flaherty ("Plaintiff") and Defendant, Wells Fargo Bank, N.A. ("Wells Fargo") (collectively, the "Parties"), by and through their undersigned counsel of record, for good cause shown, hereby stipulate and agree to extend Plaintiff's deadline to file his *Second Amended Complaint* from May 11, 2023 to May 22, 2023. This is the Parties' second request for an extension. The Parties request the extension for the following reasons:

1. On April 20, 2023, this Court granted the Parties' Stipulation and Order to Extend Deadline for Plaintiff to file Amended Complaint (ECF No. 43), which extended the deadline from April 27, 2023 to May 11, 2023.

2. Since then, the Parties have engaged in settlement discussions. However, Defendant's counsel has been unable to advance such discussions due to illness and other pressing deadlines. The Parties remain cautiously optimistic about settlement, but seek to continue such discussions and avoid incurring additional attorneys' fees by filing further pleadings unnecessarily. The Parties seek an additional 10-day extension of the deadline in an attempt to fully resolve this matter.

3. Due to continued discussions of resolution, the Parties respectfully request a ten (10) day extension for Plaintiff to file his Amended Complaint from May 11, 2023 to and including May 22, 2023.

This stipulated extension is for good cause, and not for improper delay.

DATED this 10<sup>th</sup> day of May, 2023.

**SNELL & WILMER LLP**

*/s/ Kelly H. Dove*

By: \_\_\_\_\_

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DATED this 10<sup>th</sup> day of May, 2023.

**WILEY PETERSEN**

By: \_\_\_\_\_

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*Attorneys for Plaintiff*

**ORDER**

**IT IS SO ORDERED.**

Dated May 10, 2023



UNITED STATES DISTRICT COURT JUDGE